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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

BRITTANY RENEE RANSOM	§	CASE NO. 23-30856-13
	§	
Debtor,	§	CHAPTER 13
	§	
COOPERZADEH MGMT., LLC	§	
Movant,	§	
	§	
VS.	§	Preliminary Hearing on Motion
BRITTANY RENEE RANSOM	§	for Relief from Automatic Stay:
residence		
	§	
Respondent.	§	

DEBTOR'S ANSWER AND OBJECTION TO
MOTION FOR RELIEF FROM AUTOMATIC STAY
FILED BY COOPERZADEH MGMT., LLC

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW **RANSOM, BRITTANY RENEE** ("Debtor" whether singular or plural) and requests of the Court that a hearing be scheduled on the subject matter and files this Debtor's Answer and Objection to Motion for Relief from Automatic Stay Filed by COOPERZADEH MGMT., LLC ("Movant"), and in support hereof would respectfully show the Court as follows:

ELEMENT OF DEBTOR'S DEFENSE

1. There exists cause justifying the denial of Movant's Motion and requested action for the following reasons:

A. The property is necessary for the effective reorganization of the Debtor because it is the Debtor's residence

B. Debtor would show the Court that adequate protection is being paid by paying the indebtedness through Debtor's Confirmed Chapter 13 Plan of reorganization.

C. Debtor would show that the subject property is adequately insured to the extent necessary, proper, and sufficient to protect Movant's interest in the collateral.

D. Debtor would show the Court that any default may be cured within a reasonable time.

E. Debtor's Counsel will contact the Opposing Counsel to resolve this matter with an Agreed Order prior to the hearing date.

RIGHT TO AMEND OR SUPPLEMENT RESERVED

2. Debtor reserves the right to amend or supplement this Answer with additional information supported by Debtor's evidence, affidavit and/or amended answer.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Debtor prays that a hearing be set in the instant matter, that Movant's Motion be denied in all respects and that the automatic stay pursuant to §362 of the United States Bankruptcy Code remain in full force and effect, and for such other and further relief to which the Debtor may show herself entitled.

ALLMAND LAW FIRM, PLLC

/s/ Jason Sughrue

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 12, 2023, a true and correct copy of the foregoing was served on all parties in interest below.

DEBTOR(S):

Ransom, Brittany Renee
166 Yale Ave
Red Oak, TX 75154

OPPOSING COUNSEL

Brandy Alexander
SBN: 24108421
2502 La Branch St.
Houston, Texas 77004

TRUSTEE:

Tom Powers
105 Decker Ct., 11th Flr., Ste. 1150
Irving, Texas 75062

U.S. TRUSTEE

Office of the U.S. Trustee
110 N. College Avenue, Suite 300
Tyler, Texas 75702

/s/ Jason Sughrue
Jason Sughrue
State Bar No. 24048150